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April 5, 2023

VIA CM-ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

RE: *Altimeo Asset Management v. Qihoo 360 Technology Co. Ltd., et al.*,
No. 1:19-cv-10067-PAE (S.D.N.Y.)

Dear Judge Engelmayer:

We write on behalf of Lead Plaintiffs Altimeo Asset Management and ODS Capital LLC (collectively, "Plaintiffs"), to respectfully request an extension of time to file Plaintiffs' proposed Second Amended Complaint ("SAC"), until April 12, 2023.

In today's Order (ECF No. 151), the Court ordered Plaintiffs to file the SAC by April 7, 2023. Plaintiffs appreciate that the Court has requested that Plaintiffs file the SAC, and agree that it will "facilitate informed briefing and assessment" of Plaintiffs' pending motion for reconsideration.

Plaintiffs respectfully request three additional business days, until April 12, 2023, to file the SAC given the Passover holiday that started this evening and will take key members of Lead Counsel offline for the remainder of the week for religious observance. Allowing a limited amount of extra time for Lead Plaintiffs to file the SAC will greatly assist Lead Counsel in light of these personal constraints and the need to ensure that the allegations from the transcript for the Appraisal Action trial, spanning over 2,000 pages, are properly incorporated into the SAC.

Plaintiffs of course consent to the extension of the remaining deadlines set forth in today's Order (ECF No. 151) by an additional three business days. This is the first request for an extension of this deadline, and given the urgency of this request, Plaintiffs have not solicited Defendants' position on the requested extension.

Plaintiffs thank the Court for its attention to this matter.

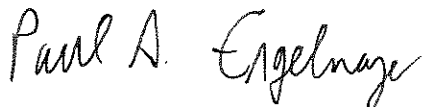
Respectfully submitted,

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<u>/s/ Michael Grunfeld</u> Michael Grunfeld POMERANTZ LLP 600 Third Avenue, 20th Floor New York, NY 10016 Telephone: (212) 661-1100 Facsimile: (212) 661-8665 Email: mgrunfeld@pomlaw.com <i>Lead Counsel for Co-Lead Plaintiffs Altimeo Asset Management and ODS Capital LLC</i>	<u>/s/ Carol C. Villegas</u> Carol C. Villegas LABATON SUCHAROW LLP 140 Broadway, 34th Floor New York, NY 10005 Telephone: (212) 907-0700 Facsimile: (212) 818-0477 Email: cvillegas@labaton.com <i>Additional Counsel for Co-Lead Plaintiff ODS Capital LLC</i>
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Plaintiffs' motion for reconsideration had implied that the Second Amended Complaint had been drafted and that, upon a court order, plaintiffs would file it. Given plaintiffs' clarification that the Second Amended Complaint is as yet undrafted, the Court grants plaintiffs' request for an extension. Plaintiffs' Second Amended Complaint is due April 12, 2023. Defendants' responses to the motion for reconsideration are due April 26, 2023. Plaintiffs' reply, if any, is due May 3, 2023. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
April 6, 2023